

BURNS BAIR LLP

Timothy W. Burns, Esq. (admitted *pro hac vice*)

Jesse J. Bair, Esq. (admitted *pro hac vice*)

10 E. Doty St., Suite 600

Madison, WI 53703-3392

Telephone: (608) 286-2808

Email: tburns@burnsbair.com

Email: jbair@burnsbair.com

*Special Insurance Counsel to the Official Committee
of Unsecured Creditors of The Roman Catholic Diocese
of Rockville Centre, New York*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

THE ROMAN CATHOLIC DIOCESE OF
ROCKVILLE CENTRE, NEW YORK,
Debtor.

Chapter 11

Case No. 20-12345 (MG)

**TWENTY-SIXTH MONTHLY FEE STATEMENT OF BURNS BAIR LLP,
AS SPECIAL INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR PROFESSIONAL SERVICES RENDERED
AND DISBURSEMENTS INCURRED FOR THE PERIOD FROM
DECEMBER 1, 2022 THROUGH DECEMBER 31, 2022**

Name of Applicant:	Burns Bair LLP
Authorized to Provide Professional Services to:	Official Committee of Unsecured Creditors
Date of Retention:	Effective October 29, 2020 pursuant to Order dated December 9, 2020 [Docket No. 246]
Period for which compensation and reimbursement is sought:	December 1, 2022 – December 31, 2022
Amount of Compensation sought as actual, reasonable, and necessary:	\$115,484.00 80% of which is \$92,387.20
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	\$751.96
TOTAL (80% of fees and 100% of costs)	\$93,139.16

This is the Twenty-Sixth Monthly Fee Statement.

PRELIMINARY STATEMENT

Burns Bair LLP (“Burns Bair”), as Special Insurance Counsel to the Official Committee of Unsecured Creditors (the “Committee”) of The Roman Catholic Diocese of Rockville Centre, New York (the “Debtor”), hereby submits this twenty-sixth monthly statement (the “Monthly Statement”) for the period from December 1, 2022 through December 31, 2022 (the “Statement Period”) for payment of professional services rendered and reimbursement of expenses incurred during the Statement Period pursuant to the Court’s *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* dated November 4, 2020 [Docket No. 129] (the “Interim Compensation Order”). Burns Bair requests: (a) interim allowance and payment of compensation in the amount of \$92,387.20 (80% of \$115,484.00) of fees on account of reasonable and necessary professional services rendered to the Committee by Burns Bair and (b) reimbursement of actual and necessary costs and expenses in the amount of \$751.96.

FEES FOR SERVICES RENDERED DURING THE STATEMENT PERIOD

1. Set forth below is a list of the positions of the Burns Bair professionals and paraprofessionals who provided services to the Committee during the Statement Period, their respective billing rates, and the aggregate hours spent by each professional and paraprofessional in providing services on behalf of the Committee during the Statement Period.

Name	Title	Year of Partnership	Year of Admission	Hourly Rate	Total Hours Billed	Total Compensation
Timothy Burns	Partner	2008	1991	\$975	33.70	\$32,857.50
Jesse Bair	Partner	2020	2013	\$625	56.90	\$35,562.50
Jesse Bair					.30	No Charge
Brian Cawley	Associate	N/A	2020	\$420	.20	\$84.00
Nathan Kuenzi	Associate	N/A	2020	\$420	12.80	\$5,376.00
Leakhena Au	Associate	N/A	2020	\$420	12.40	\$5,208.00
Kacy Gurewitz	Associate	N/A	2021	\$420	30.90	\$12,978.00
Chalisa Sims	Associate	N/A	2021	\$420	53.70	\$22,554.00
Karen Dempski	Paralegal	N/A	N/A	\$360.00	1.60	\$576.00
Brenda Horn-Edwards	Paralegal	N/A	N/A	\$360.00	.80	\$288.00
TOTAL:					203.30	\$115,484.00

2. The rates charged by Burns Bair for services rendered to the Committee are the same rates that it charges generally for professional services rendered to its non-bankruptcy clients. A complete itemization of tasks performed by these professionals and paraprofessionals for the Statement Period is annexed hereto as **Exhibit A**.

EXPENSES INCURRED DURING THE STATEMENT PERIOD

3. Set forth below is a categorical list of expenses incurred by Burns Bair during the Statement Period in the course of representing the Committee.

Date	Description	Amount
12/12/2022	Hotel, T. Burns	\$570.37
12/13/2022	Uber, J. Bair	\$98.57
12/13/2022	Uber, J. Bair	\$83.02
	TOTAL:	\$751.96

NOTICE AND OBJECTION PROCEDURES

4. No trustee or examiner has been appointed in these chapter 11 cases. Pursuant to the Interim Compensation Order, Burns Bair has provided notice of this statement upon the following parties by electronic or first class mail: (a) the Debtor c/o The Roman Catholic Diocese of Rockville Centre, 50 N Park Ave P.O. Box 9023, Rockville Centre, NY 11571-9023 (Attn: Thomas Renker); (b) the attorneys for the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); and (c) the Office of the United States Trustee Region 2 (the “U.S. Trustee”), 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.). Burns Bair submits that no other or further notice need be provided.

5. Pursuant to the Interim Compensation Order, objections to this Monthly Statement, if any, must be served upon the Application Recipients by **February 15, 2023** (the “**Objection Deadline**”) setting forth the nature of the objection and the amount of fees or expenses at issue.

6. If no objections to this Monthly Statement are made on or before the Objection Deadline, the Debtor shall pay Burns Bair 80% of the fees and 100% of the expenses set forth

above. To the extent an objection to this Monthly Statement is timely made, the Debtor shall withhold payment of that portion of the Monthly Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such objection is not resolved; it shall be preserved and presented to the Court at the next interim or final fee application hearing.

Dated: January 31, 2023

BURNS BAIR LLP

/s/ Timothy W. Burns

Timothy W. Burns, Esq. (admitted *pro hac vice*)

Jesse J. Bair, Esq. (admitted *pro hac vice*)

10 E. Doty St., Suite 600

Madison, WI 53703-3392

Telephone: (608) 286-2808

Email: tburns@burnsbair.com

Email: jbair@burnsbair.com

*Special Insurance Counsel to the Official
Committee of Unsecured Creditors of The Roman
Catholic Diocese of Rockville Centre, New York*

EXHIBIT A

Burns | Bair

10 E. Doty St., Suite 600
Madison, Wisconsin 53703-3392
608-286-2302
www.BurnsBair.com

**The Official Committee of Unsecured Creditors
of The Roman Catholic Diocese of Rockville
Centre**

Issue Date : 1/23/2023

Bill # : 01028

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
12/1/2022	Timothy Burns	Review agenda for December 2 hearing (.1); reviewed email from K. Brown re preliminary injunction motion scheduling and coordination with Jones Day (.1); conference with internal team re case status and needed assignments (.1); conference with J. Bair re Plan issues (.2); participate in conference with PSZJ and J. Bair re mediation strategy (1.9); review proposed edits to the proposed claims objection order (.1); review related email with state court counsel re same (.1); reviewed joint letter to Judge Cronan re the Diocese's and LMI's ongoing discovery dispute (.1); review correspondence from B. Michael re December 2 court hearing (.1);	2.80	\$2,730.00
12/1/2022	Jesse Bair	Begin reviewing draft Committee Plan (.2); participate in conference with T. Burns re insurance Plan issues (.2);	0.40	\$250.00
12/1/2022	Chalisa Sims	Discuss bad faith research project with K. Gurewitz and next steps for producing memo re same (.2); begin analyzing New York bad faith law in connection with potential settlement and litigation options (1.5);	1.70	\$714.00
12/1/2022	Nathan Kuenzi	Participate in conference with with BB team re case status and needed research projects (.1);	0.10	\$42.00
12/1/2022	Jesse Bair	Begin reviewing further revised draft of the preliminary injunction opposition brief (.3); review correspondence with I. Nasatir and G. Greenwood re same (.1);	0.40	\$250.00
12/1/2022	Kacy Gurewitz	Participate in meeting with internal team to discuss status of case and related assignments (.1);	0.10	\$42.00
12/1/2022	Jesse Bair	Participate in conference with with BB team re case status and needed research projects (.1);	0.10	\$62.50

12/1/2022	Kacy Gurewitz	Discuss bad faith research project with C. Sims and next steps for producing memo re same (.2); begin analyzing New York bad faith law in connection with potential settlement and litigation options (1.1);	1.30	\$546.00
12/1/2022	Brian Cawley	Participate in meeting with internal team to discuss status of case and related assignments (.1);	0.10	\$42.00
12/1/2022	Chalisa Sims	Participate in meeting with internal team to discuss status of case and related assignments (.1);	0.10	\$42.00
12/1/2022	Leakhena Au	Participate in conference with with BB team re case status and needed research projects (.1);	0.10	\$42.00
12/1/2022	Jesse Bair	Participate in conference with PSZJ team and T. Burns re mediation strategy and related insurance issues (1.9);	1.90	\$1,187.50
12/2/2022	Jesse Bair	Participate in conference with T. Burns re outcome of state court counsel meeting and next-steps re insurance demands (.2);	0.20	\$125.00
12/2/2022	Chalisa Sims	Continue analyzing New York bad faith law in connection with potential settlement and litigation options (4.0);	4.00	\$1,680.00
12/2/2022	Jesse Bair	Review joint letter to Judge Cronan re the Diocese's and LMI's ongoing discovery dispute (.1);	0.10	\$62.50
12/2/2022	Kacy Gurewitz	Continue analyzing New York bad faith law in connection with potential settlement and litigation options (2.7);	2.70	\$1,134.00
12/2/2022	Jesse Bair	Attend December 2 hearing re BSA opt-in motion and potential Chambers conference (.5);	0.50	\$312.50
12/2/2022	Jesse Bair	Participate in state court counsel meeting re mediation and insurance strategy (1.8);	1.80	\$1,125.00
12/2/2022	Jesse Bair	Participate in additional conference with PSZJ team and T. Burns re Plan issues (.3);	0.30	\$187.50
12/2/2022	Timothy Burns	Attend December 2 court hearing re BSA opt-in motion and potential Chambers conference (.5); participate in state court counsel meeting re mediation and insurance strategy (1.8); participate in follow-up conference with PSZJ and J. Bair re Plan issues (.3); participate in additional call with state court counsel re Plan strategy (.3); participate in call with J. Bair re outcome of state court counsel meeting and next-steps re insurance demands (.2);	3.10	\$3,022.50
12/3/2022	Jesse Bair	Correspondence with T. Burns and B. Michael re insurance demands (.1);	0.10	\$62.50
12/3/2022	Timothy Burns	Reviewed BSA opt-in order (.1); correspondence with J. Bair re potential insurance demands (.1);	0.20	\$195.00
12/4/2022	Jesse Bair	Revise and edit most recent iteration of the preliminary injunction opposition brief (1.4);	1.40	\$875.00
12/5/2022	Jesse Bair	Respond to T. Burns correspondence re potential mediation demands on the carriers (.1); review additional correspondence with T. Burns and K. Dine re same (.1);	0.20	\$125.00

12/5/2022	Timothy Burns	Analysis, consideration and development of revised insurance demand figures (.5); correspondence with J. Bair re same (.1); correspondence with B. Michael re same (.2);	0.80	\$780.00
12/5/2022	Jesse Bair	Begin revising and editing the draft Committee-only Plan (1.0);	1.00	\$625.00
12/6/2022	Jesse Bair	Review agenda for upcoming Committee meeting (.1);	0.10	\$62.50
12/6/2022	Jesse Bair	Review monthly PSIP information received from the Debtor (.1);	0.10	\$62.50
12/6/2022	Jesse Bair	Correspondence with B. Michael re upcoming Chambers conference (.1); conference with T. Burns re same (.1);	0.20	\$125.00
12/6/2022	Kacy Gurewitz	Continue analyzing New York bad faith law in connection with potential settlement and litigation options (1.5);	1.50	\$630.00
12/6/2022	Timothy Burns	Correspondence with B. Michael re chambers conference (.1); met with J. Bair re same (.1); reviewed Debtor PSIP monthly information (.1); reviewed correspondence concerning settlement demands between PSZJ and BB (.2); brief review of latest draft of preliminary injunction response brief with changes (.2);	0.70	\$682.50
12/6/2022	Jesse Bair	Continue editing and revising the draft Committee-only Plan (1.9);	1.90	\$1,187.50
12/7/2022	Jesse Bair	Continue reviewing and editing current draft of the Committee-only Plan (.5);	0.50	\$312.50
12/7/2022	Jesse Bair	Participate in call with T. Burns re insurance issues in connection with upcoming state court counsel meeting (.1);	0.10	\$62.50
12/7/2022	Timothy Burns	Participate in call with J. Bair re insurance issues in connection with upcoming state court counsel meeting (.1); participate in call with particular state court counsel re same (.1); follow-up analysis re insurance mediation issues (.1);	0.30	\$292.50
12/8/2022	Jesse Bair	Analyze I. Nasatir's suggested edits to the draft Committee-only Plan (.5);	0.50	\$312.50
12/8/2022	Kacy Gurewitz	Continue detailed research re New York bad faith law in connection with potential settlement and litigation options (2.5);	2.50	\$1,050.00
12/8/2022	Jesse Bair	Finish reviewing and editing current draft of the Committee-only Plan, including incorporation of I. Nasatir's suggested edits (2.6);	2.60	\$1,625.00
12/8/2022	Jesse Bair	Review agenda for strategy meeting with PSZJ team (.1); participate in conference with PSZJ team re mediation strategy (1.6);	1.70	\$1,062.50
12/8/2022	Chalisa Sims	Additional research re New York bad faith law in connection with potential settlement and litigation options (.5);	0.50	\$210.00
12/9/2022	Timothy Burns	Participate in call with J. Bair re outcome of state court counsel meeting re insurance demands (.1);	0.10	\$97.50

12/9/2022	Jesse Bair	Participate in call with B. Michael re further insurance edits to the Committee Plan (.3); additional analysis re insurance aspects of draft Plan (.2);	0.50	\$312.50
12/9/2022	Jesse Bair	Prepare for state court counsel meeting re insurance demands (.2); participate in state court counsel meeting re insurance demands (.8); participate in follow-up call with T. Burns re outcome of state court counsel meeting (.1);	1.10	\$687.50
12/11/2022	Timothy Burns	Review Novak decision re Diocesan liability and email from state court counsel re same (.3); review B. Michael correspondence to state court counsel re follow-up from December 9 state court counsel meeting (.1); brief review of BSA case appellate papers of insurers and Tort Claim Committee in district court re issues potentially relevant to resolution of this case (.4);	0.80	\$780.00
12/11/2022	Jesse Bair	Review revised draft of the Committee-only Plan circulated by B. Michael (.6);	0.60	\$375.00
12/11/2022	Jesse Bair	Review correspondence from K. Dine and I. Nasatir re potential insurance revisions to the draft Plan (.1);	0.10	\$62.50
12/11/2022	Jesse Bair	Edit and revise most recent iteration of the draft Committee-only Plan (1.3); correspondence with PSZJ team and T. Burns re same and additional potential insurance revisions to consider (.2);	1.50	\$937.50
12/12/2022	Jesse Bair	Review correspondence from B. Michael re upcoming Chambers conference (.1);	0.10	\$62.50
12/12/2022	Jesse Bair	Conference with T. Burns re insurance issues in connection with upcoming Chambers conference (.1);	0.10	\$62.50
12/12/2022	Kacy Gurewitz	Continue detailed research re New York bad faith law in connection with potential settlement and litigation options (3.1);	3.10	\$1,302.00
12/12/2022	Timothy Burns	Conference with J. Bair re insurance issues in connection with upcoming Chambers conference (.1);	0.10	\$97.50
12/13/2022	Kacy Gurewitz	Continue detailed research re New York bad faith law in connection with potential settlement and litigation options (3.0);	3.00	\$1,260.00
12/13/2022	Jesse Bair	Prepare while traveling to Chambers conference (.8); participate in Chambers conference (2.5); met with T. Burns re outcome of Chambers conference and potential next-steps (1.0);	4.30	\$2,687.50
12/13/2022	Kacy Gurewitz	Research New York law re security posting requirements of unauthorized foreign insurers (1.6); correspond with T. Burns re same (.2);	1.80	\$756.00
12/13/2022	Jesse Bair	Participate in portion of state court counsel meeting re insurance strategy (.8); conference with T. Burns re security posting requirements of unauthorized foreign insurers (.1);	0.90	\$562.50

12/13/2022	Timothy Burns	Review draft Committee objection to the Diocese's claim procedure motion (.4); review correspondence from K. Brown and G. Greenwood re edits to same (.1); review case law materials re security posting requirements of unauthorized foreign insurers (.8); met with J. Bair re same (.1); call with J. Stang and I. Nasatir re draft Committee objection to claim procedure motion (.2); prepare while traveling to Chambers conference (.8); participate in Chambers conference (2.5); met with J. Bair re outcome of Chambers conference and potential next-steps (1.0); participated in part of Committee meeting re insurance strategy (.8); review correspondence from B. Michael re potential insurance demands (.1);	6.80	\$6,630.00
12/13/2022	Jesse Bair	Review and edit the Committee's objection to the Debtor's claim procedure motion (.5); correspondence with K. Brown and B. Michael re additional revisions to same (.1);	0.60	\$375.00
12/14/2022	Timothy Burns	Review Claro charts on verdict and settlement values (.4); review B. Michael correspondence to Claro re non-sexual abuse claims (.1);	0.50	\$487.50
12/15/2022	Nathan Kuenzi	Analyze and draft spreadsheet detailing all proofs of claim implicating various coverage periods for use in connection with insurance settlement demands (5.3);	5.30	\$2,226.00
12/15/2022	Jesse Bair	Analysis re proof of claim information re insurer allocation in connection with insurer demands (.6); participate in call with N. Kuenzi re additional analysis needed in connection with same (.2);	0.80	\$500.00
12/15/2022	Jesse Bair	Analyze prior research re insurance assignment under non-consensual Plans (.3); correspondence with internal team re supplemental research needed in connection with same (.2);	0.50	\$312.50
12/15/2022	Jesse Bair	Review supplemental POC analysis re insurer allocation received from N. Kuenzi (.3); correspondence with N. Kuenzi re additional edits needed re same (.1);	0.40	\$250.00
12/15/2022	Nathan Kuenzi	Draft updated spreadsheet re POC analysis in connection with insurance demands (.3);	0.30	\$126.00
12/15/2022	Kacy Gurewitz	Research case law re insurance assignments under non-consensual Plans (3.9);	3.90	\$1,638.00
12/15/2022	Nathan Kuenzi	Participate in call with J. Bair re additional analysis needed in connection with POC overview for insurer demands (.2);	0.20	\$84.00
12/15/2022	Nathan Kuenzi	Additional analysis of Diocesan insurance policies in connection with supplemental POC review for use in connection with insurance demands (3.2);	3.20	\$1,344.00
12/15/2022	Nathan Kuenzi	Analyze case law re insurance assignments under non-consensual Plans (1.1);	1.10	\$462.00

12/15/2022	Jesse Bair	Review and respond to correspondence with K. Dine, J. Stang, and B. Michael re insurance demands (.2); analysis re structure of insurer demands (.1);	0.30	\$187.50
12/16/2022	Jesse Bair	Correspondence with G. Greenwood re preliminary injunction insurance issues (.1); correspondence with Jones Day re same (.1);	0.20	\$125.00
12/16/2022	Jesse Bair	Prepare for court hearing re interim fee applications and case status (.3); participate in court hearing re same (.6); review and respond to correspondence with K. Dine and PSZJ team re outcome of hearing (.2);	1.10	\$687.50
12/16/2022	Jesse Bair	Review N. Kuenzi email memorandum re insurer constructive denial of coverage (.2);	0.20	\$125.00
12/16/2022	Nathan Kuenzi	Draft further revised version of POC analysis, incorporating J. Bair edits, for use in connection with insurer demands (.6);	0.60	\$252.00
12/16/2022	Timothy Burns	Review correspondence with PSZJ and BB re outcome of fee/status hearing (.2); review preliminary injunction agreed coverage summary received from the debtor (.2); review and revise demand letters to insurers (.2); analysis and emails with J. Bair re same (.2);	0.80	\$780.00
12/16/2022	Jesse Bair	Analyze Judge Rochon's order granting in part and denying in part Arrowood's motion to compel (.7); draft email memo to PSZJ team regarding same (.2);	0.90	\$562.50
12/16/2022	Jesse Bair	Draft demand letters on the insurers (1.1); correspondence with PSZJ re same and transmittal to the mediator (.2); correspondence with T. Burns re suggested edits to same (.2); draft revised versions of demand letters incorporating T. Burns' suggested edits (.3); finalize letters and draft transmittal email to the mediator (.2); follow-up correspondence with the mediator re demands (.1);	2.10	\$1,312.50
12/17/2022	Jesse Bair	Review correspondence from the mediator re Committee insurance demands (.1);	0.10	\$62.50
12/18/2022	Timothy Burns	Review correspondence from the mediator re demands to insurers (.1);	0.10	\$97.50
12/19/2022	Jesse Bair	Review Claro spreadsheet re comparable verdicts (.1);	0.10	\$62.50
12/19/2022	Nathan Kuenzi	Participate in conference with J. Bair re supplemental analysis needed re which insurance program(s), if any, are triggered by each individual CVA action for purposes of preliminary injunction briefing (.2);	0.20	\$84.00
12/19/2022	Chalisa Sims	Further research re New York bad faith law in connection with potential settlement and litigation options (3.3); participate in internal team meeting re case status and assignments (.1);	3.40	\$1,428.00

12/19/2022	Timothy Burns	Conference with internal team re case status and assignments (.1);	0.10	\$97.50
12/19/2022	Nathan Kuenzi	Perform supplemental analysis to confirm which insurance program(s), if any, are triggered by each individual CVA action for purposes of preliminary injunction briefing (1.8);	1.80	\$756.00
12/19/2022	Jesse Bair	Participate in conference with N. Kuenzi re supplemental analysis needed re which insurance program(s), if any, are triggered by each individual CVA action for purposes of preliminary injunction briefing (.2);	0.20	\$125.00
12/19/2022	Jesse Bair	Conference with team re case status and assignments (.1);	0.10	\$62.50
12/19/2022	Kacy Gurewitz	Conference with internal team re case status and assignments (.1);	0.10	\$42.00
12/19/2022	Brian Cawley	Participate in conference with internal team re case status and assignments (.1);	0.10	\$42.00
12/19/2022	Leakhena Au	Meet with internal team re case status and assignments (.1);	0.10	\$42.00
12/19/2022	Jesse Bair	Review Claro spreadsheet re comparable settlements (.1);	0.10	\$62.50
12/20/2022	Jesse Bair	Review B. Michael correspondence re most recent draft of the Committee Plan and Trust Allocation Protocol (.1); review correspondence with I. Nasatir re potential Plan edits (.1);	0.20	\$125.00
12/20/2022	Jesse Bair	Review correspondence with PSZJ and Claro re valuation of non-abuse personal injury claims (.2);	0.20	\$125.00
12/20/2022	Brenda Horn	Draft BB monthly fee statement (.6); generate and edit Exhibit A to same (.1); correspond with J. Bair re same (.1);	0.80	\$288.00
12/20/2022	Chalisa Sims	Continue detailed research re New York bad faith law in connection with potential settlement and litigation options (2.7);	2.70	\$1,134.00
12/20/2022	Jesse Bair	Review correspondence from state court counsel re recent decision involving liability for Order priests (.1);	0.10	\$62.50
12/20/2022	Jesse Bair	Review Arrowood's limited objection to the Diocese's claim procedures motion (.1);	0.10	\$62.50
12/20/2022	Jesse Bair	Review correspondence from the mediator re upcoming mediation sessions (.1);	0.10	\$62.50
12/20/2022	Kacy Gurewitz	Begin drafting memorandum summarizing comprehensive review of New York bad faith law for use in connection with potential settlement and litigation strategy (2.2);	2.20	\$924.00
12/20/2022	Chalisa Sims	Continue detailed research re New York bad faith law in connection with potential settlement and litigation options (4.0);	4.00	\$1,680.00
12/20/2022	Jesse Bair	Review correspondence with B. Michael and the Diocese re the Diocese's historical data involving non-abuse personal injury claims (.1);	0.10	\$62.50

12/20/2022	Karen DempSKI	Process recent production of Non-Abuse and Adult Claim POC documents (1.6);	1.60	\$576.00
12/21/2022	Jesse Bair	Review the parties' joint statement re the recent Chambers conference (.1);	0.10	\$62.50
12/21/2022	Jesse Bair	Review and respond to correspondence with the mediator and PSZJ team re the Committee's recent insurance mediation demands (.2);	0.20	\$125.00
12/21/2022	Jesse Bair	Analysis re claim information in connection with potential additional individual demand letters on the insurers (.4); review correspondence with B. Michael re same (.1);	0.50	\$312.50
12/21/2022	Jesse Bair	Review correspondence with T. Burns and the mediator re the upcoming January mediation session (.1);	0.10	\$62.50
12/21/2022	Jesse Bair	Draft notice of change of firm name (.2); correspondence with B. Michael re same (.1);	0.30	No Charge
12/21/2022	Chalisa Sims	Continue drafting memorandum summarizing comprehensive review of New York bad faith law for use in connection with potential settlement and litigation strategy (3.9);	3.90	\$1,638.00
12/21/2022	Timothy Burns	Correspondence with the mediator re upcoming January mediation session (.2);	0.20	\$195.00
12/22/2022	Timothy Burns	Review correspondence with the mediator re insurer demands (.2);	0.20	\$195.00
12/22/2022	Jesse Bair	Review order in the Evanston district court action re case scheduling (.1);	0.10	\$62.50
12/22/2022	Jesse Bair	Review K. Dine email to the Committee re outcome of Chambers conference (.1);	0.10	\$62.50
12/22/2022	Jesse Bair	Review the Diocese reply brief in support of its claim procedures motion (.3); review K. Dine email to state court counsel re same and the upcoming mediation (.1);	0.40	\$250.00
12/23/2022	Jesse Bair	Review the Diocese's draft Order re dismissal of IRCP coverage claims in the Arrowood district court action (.1); review the Diocese's draft amended complaint against Arrowood (.2);	0.30	\$187.50

12/23/2022	Timothy Burns	Review consent order re amending complaint in Arrowood district court action (.1); review proposed case management plan in Arrowood district court action (.1); review Arrowood's and J. Bair's proposed revisions to same (.1); correspondence with J. Bair re same (.1); review materials concerning recent debtor insurance activities (.2); correspond with J. Bair re same (.1); participate in call with particular state court counsel re mediation and litigation strategy, including consideration of potential judicial co-mediator (.8); participate in call with J. Stang and particular state court counsel re same (.5); participate in weekly state court counsel meeting re same (1.4); post-call with PSZJ and J. Bair re same (.9); participate in additional call with J. Bair re same (.1); participate in final call with particular state court counsel re same (.2);	4.60	\$4,485.00
12/23/2022	Jesse Bair	Participate in state court counsel meeting re mediation and litigation strategy, including consideration of potential judicial co-mediator (1.4);	1.40	\$875.00
12/23/2022	Jesse Bair	Review and edit revised draft of the Committee-only Plan (.9);	0.90	\$562.50
12/23/2022	Kacy Gurewitz	Continue research into New York bad faith law in connection with potential litigation and settlement strategies (1.0);	1.00	\$420.00
12/23/2022	Jesse Bair	Review and edit draft case management plan in the Arrowood district court action (.2); review Arrowood's suggested edits to same (.1);	0.30	\$187.50
12/23/2022	Jesse Bair	Respond to T. Burns correspondence re recent Diocesan insurance activities (.1);	0.10	\$62.50
12/23/2022	Jesse Bair	Participate in additional conference with PSZJ team and T. Burns re potential next-steps for mediation and litigation strategy, including judicial co-mediator issue (.9); post-call with T. Burns re same (.1);	1.00	\$625.00
12/24/2022	Jesse Bair	Review and edit draft email memorandum to state court counsel re mediation strategy, including judicial co-mediator issue (.5); correspondence with T. Burns re same (.1); review K. Dine's additional proposed revisions to same (.2); correspondence with T. Burns and PSZJ re same (.1); review final version of email memorandum to state court counsel (.1);	1.00	\$625.00
12/24/2022	Timothy Burns	Review and revise draft email memorandum to state court counsel re mediation strategy, including judicial co-mediator issue (1.1); review and respond to various correspondence with PSZJ and J. Bair re same (.4);	1.50	\$1,462.50
12/24/2022	Leakhena Au	Analyze New York bad faith law for use in connection with potential settlement and litigation strategy (3.9);	3.90	\$1,638.00

12/25/2022	Kacy Gurewitz	Continue drafting portions of memorandum summarizing comprehensive review of New York bad faith law for use in connection with potential settlement and litigation strategy (1.7);	1.70	\$714.00
12/25/2022	Jesse Bair	Review correspondence from state court counsel re mediation strategy (.1);	0.10	\$62.50
12/26/2022	Timothy Burns	Participate in call with PSZJ and certain state court counsel re mediation strategy, including juridical co-mediator issues (.5); participate in subsequent call with PSZJ and certain state court counsel re same (.5); additional analysis re mediation strategy (.1); participate in call with J. Bair re same (.3); participate in meeting with full state court counsel group re same (.9); post-call with PSZJ and J. Bair re draft correspondence to the Debtor re same (.2); participate in call with PSZJ and J. Bair re insurance demands (.4);	2.90	\$2,827.50
12/26/2022	Chalisa Sims	Continue drafting portions of memorandum summarizing comprehensive review of New York bad faith law for use in connection with potential settlement and litigation strategy (4.2);	3.80	\$1,596.00
12/26/2022	Jesse Bair	Participate in conference with I. Nasatir, B. Michael, and T. Burns re individual insurance demand issues and strategy (.4);	0.40	\$250.00
12/26/2022	Kacy Gurewitz	Continue drafting portions of memorandum summarizing comprehensive review of New York bad faith law for use in connection with potential settlement and litigation strategy (.7);	0.70	\$294.00
12/26/2022	Jesse Bair	Review draft correspondence to the debtor re judicial co-mediator proposal (.1); review correspondence with PSZJ and T. Burns re same (.1);	0.20	\$125.00
12/26/2022	Jesse Bair	Participate in state court counsel meeting re mediation strategy and judicial co-mediator issues (.9); participate in post-meeting conference with PSZJ and T. Burns re same (.2);	1.10	\$687.50
12/26/2022	Jesse Bair	Participate in conference with T. Burns re mediation strategy and juridical co-mediator issue (.3);	0.30	\$187.50
12/27/2022	Timothy Burns	Review correspondence with state court counsel and J. Stang re judicial co-mediator options (.2); participate in call with J. Bair re same (.1);	0.30	\$292.50
12/27/2022	Jesse Bair	Review revised draft of the proposed case management plan in the Arrowood district court action (.1);	0.10	\$62.50
12/27/2022	Jesse Bair	Participate in Committee meeting re mediation strategy and juridical co-mediator issues (1.0);	1.00	\$625.00
12/27/2022	Jesse Bair	Review agenda for upcoming Committee meeting (.1);	0.10	\$62.50
12/27/2022	Jesse Bair	Review correspondence with state court counsel and J. Stang re judicial co-mediator options (.2); participate in call with T. Burns re same (.1);	0.30	\$187.50

12/27/2022	Leakhena Au	Draft portions of memorandum summarizing comprehensive review of New York bad faith law for use in connection with potential settlement and litigation strategy (3.3);	3.30	\$1,386.00
12/27/2022	Jesse Bair	Participate in conference with PSZJ re Plan issues (.3);	0.30	\$187.50
12/27/2022	Chalisa Sims	Continue drafting portions of memorandum summarizing comprehensive review of New York bad faith law for use in connection with potential settlement and litigation strategy (3.8);	3.80	\$1,596.00
12/27/2022	Timothy Burns	Review additional correspondence from state court counsel re judicial co-mediator and Plan disclosure (.1);	0.10	\$97.50
12/27/2022	Chalisa Sims	Continue drafting portions of memorandum summarizing comprehensive review of New York bad faith law for use in connection with potential settlement and litigation strategy (3.5);	3.50	\$1,470.00
12/27/2022	Jesse Bair	Participate in state court counsel meeting re mediation strategy and juridical co-mediator issues (.5);	0.50	\$312.50
12/28/2022	Chalisa Sims	Continue drafting portions of memorandum summarizing comprehensive review of New York bad faith law for use in connection with potential settlement and litigation strategy (4.0);	4.00	\$1,680.00
12/28/2022	Jesse Bair	Review updated Committee litigation task-list (.1);	0.10	\$62.50
12/28/2022	Timothy Burns	Review correspondence from state court counsel re judicial mediator issue, parish stay, and plan disclosures (.2);	0.20	\$195.00
12/28/2022	Jesse Bair	Review and edit most recent version of the Committee-only Plan (2.3);	2.30	\$1,437.50
12/28/2022	Timothy Burns	Review updated Committee litigation task-list (.1); review Plan-related legal research chart (.2);	0.30	\$292.50
12/28/2022	Jesse Bair	Review final version of case management order entered in the Arrowood district court action (.1);	0.10	\$62.50
12/28/2022	Jesse Bair	Review correspondence from B. Michael re additional insurance-related research projects needed from completion re Plan finalization (.1);	0.10	\$62.50
12/28/2022	Jesse Bair	Review and edit draft Trust Allocation Protocol (1.1);	1.10	\$687.50
12/28/2022	Timothy Burns	Review email exchange between PSZJ and Jones Day re non-abuse claims data (.1);	0.10	\$97.50
12/28/2022	Jesse Bair	Review Order granting the Diocese leave to file second amended complaint in the Arrowood district court action (.1);	0.10	\$62.50
12/28/2022	Jesse Bair	Review B, Michael memo re Plan research topics (.2);	0.20	\$125.00
12/28/2022	Chalisa Sims	Continue drafting portions of memorandum summarizing comprehensive review of New York bad faith law for use in connection with potential settlement and litigation options (3.5);	3.50	\$1,470.00

12/28/2022	Jesse Bair	Analysis re Ecclesia Plan-related questions from B. Michael (.4); draft response to same (.2);	0.60	\$375.00
12/28/2022	Timothy Burns	Review correspondence from state court counsel re judicial co-mediator (.1);	0.10	\$97.50
12/28/2022	Jesse Bair	Correspondence with PSZJ team re suggested edits to the Committee Plan and Trust Allocation Protocol (.1);	0.10	\$62.50
12/29/2022	Timothy Burns	Participate in call with PSZJ and J. Bair re mediation, litigation, and Plan strategy (2.5);	2.50	\$2,437.50
12/29/2022	Jesse Bair	Review correspondence from B. Michael and the Debtor re non-abuse claim information (.1);	0.10	\$62.50
12/29/2022	Jesse Bair	Review case law re anti-assignment clauses under New York law (.2);	0.20	\$125.00
12/29/2022	Jesse Bair	Review correspondence from state court counsel re judicial co-mediator issues (.1);	0.10	\$62.50
12/29/2022	Jesse Bair	Review and respond to correspondence with Claro re insurance allocation issues re Evanston and Lexington (.2);	0.20	\$125.00
12/29/2022	Chalisa Sims	Continue drafting portions of memorandum summarizing comprehensive review of New York bad faith law for use in connection with potential settlement and litigation options (4.0);	4.00	\$1,680.00
12/29/2022	Leakhena Au	Continue detailed research re New York bad faith law in connection with potential settlement and litigation options (3.1); continue drafting portions of memorandum summarizing same (1.9);	5.00	\$2,100.00
12/29/2022	Chalisa Sims	Additional drafting of portions of memorandum summarizing comprehensive review of New York bad faith law for use in connection with potential settlement and litigation options (3.2);	3.20	\$1,344.00
12/29/2022	Jesse Bair	Participate in portion of team meeting with PSZJ and T. Burns re mediation, litigation, and Plan strategy (2.2);	2.20	\$1,375.00
12/29/2022	Jesse Bair	Review and edit PowerPoint presentation re Committee Plan, including drafting slides describing insurance issues (1.3); draft correspondence to PSZJ summarizing suggested changes (.1);	1.40	\$875.00
12/29/2022	Jesse Bair	Review case law re assignment of insurance rights under non-consensual Plans (.4);	0.40	\$250.00
12/29/2022	Jesse Bair	Review correspondence with B. Michael and I. Nasatir re Plan issues re personal injury claims and Ecclesia (.1);	0.10	\$62.50
12/30/2022	Jesse Bair	Participate in call with T. Burns re mediation strategy (.5);	0.50	\$312.50
12/30/2022	Kacy Gurewitz	Continue detailed research re New York bad faith law in connection with potential settlement and litigation options (2.1); continue drafting portions of memorandum summarizing same (.9);	3.00	\$1,260.00
12/30/2022	Jesse Bair	Analysis re insurance strategy in preparation for upcoming mediation (.2);	0.20	\$125.00

12/30/2022	Jesse Bair	Review draft email to Jones Day re judicial mediator issue (.1); review correspondence from PSZJ re suggested edits to same (.1); review correspondence from state court counsel re additional suggested edits (.1);	0.30	\$187.50
12/30/2022	Jesse Bair	Participate in call with T. Burns and particular state court counsel re mediation strategy (.4);	0.40	\$250.00
12/30/2022	Chalisa Sims	Continue detailed research re New York bad faith law in connection with potential settlement and litigation options (2.9); continue drafting portions of memorandum summarizing same (1.0);	3.90	\$1,638.00
12/30/2022	Timothy Burns	Participate in call with J Bair re mediation strategy (.5); participate in call with J. Bair and particular state court counsel re same (.4); participate in weekly state court counsel meeting re mediation and litigation strategy (1.0); participate in follow-up call with PSZJ and J. Bair re outcome re state court counsel meeting and next-steps (.3); review multiple emails with PSZJ and state court counsel re same and judicial co-mediator issues (.3); review correspondence with PSZJ re Plan issues (.2);	2.70	\$2,632.50
12/30/2022	Chalisa Sims	Continue drafting portions of memorandum summarizing comprehensive review of New York bad faith law for use in connection with potential settlement and litigation strategy (3.7);	3.70	\$1,554.00
12/30/2022	Timothy Burns	Review Claro analysis re non-abuse claims (.3);	0.30	\$292.50
12/30/2022	Jesse Bair	Participate in weekly state court counsel meeting re mediation and litigation strategy (1.0); participate in follow-up call with PSZJ and T. Burns re outcome of state court counsel meeting and next-steps re case (.3);	1.30	\$812.50
12/31/2022	Kacy Gurewitz	Additional drafting of portions of memorandum summarizing comprehensive review of New York bad faith law for use in connection with potential settlement and litigation options (2.3);	2.30	\$966.00
12/31/2022	Jesse Bair	Participate in conference with T. Burns re insurance strategy for upcoming mediation (.1);	0.10	\$62.50
12/31/2022	Timothy Burns	Participate in call with J. Stang re strategy for upcoming mediation (.4); participate in call with J. Bair re same (.1);	0.50	\$487.50
Total Hours and Fees			203.30	\$115,484.00

EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
12/12/2022	Hotel, T. Burns (1 night)	\$570.37
12/13/2022	Uber, J. Bair	\$98.57
12/13/2022	Uber, J. Bair	\$83.02
Expenses Subtotal		\$751.96

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brenda Horn	0.80	\$360.00	\$288.00
Brian Cawley	0.20	\$420.00	\$84.00
Chalisa Sims	53.70	\$420.00	\$22,554.00
Jesse Bair	56.90	\$625.00	\$35,562.50
Jesse Bair	0.30	No Charge	No Charge
Kacy Gurewitz	30.90	\$420.00	\$12,978.00
Karen Dempski	1.60	\$360.00	\$576.00
Leakhena Au	12.40	\$420.00	\$5,208.00
Nathan Kuenzi	12.80	\$420.00	\$5,376.00
Timothy Burns	33.70	\$975.00	\$32,857.50

Total Due This Invoice: \$116,235.96